

# **SUPPLIER CODE OF ETHICS**

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**Annex 14 of the Crime Prevention Manual**  
**Bodegues Sumarroca Group**

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## 1. INTRODUCTION

Bodegues Sumarroca Group<sup>1</sup> aspires to offer products and services of the highest quality. In this regard, the conduct of its staff and all participants in the value chain must respond to and accommodate the current legislation and the ethical and corporate social responsibility principles and, in particular, in labour matters, human rights and respect for the environment.

Bodegues Sumarroca Group has a Compliance System that aims to adopt and execute, with maximum efficiency, measures and controls that help prevent or mitigate the risk of committing any non-compliance within the Group and that guarantees, at all times, the legality of the actions that, in performing their professional and business activity, the people that form part of their organisation carry out, as well as third parties with whom they do business.

Therefore, Bodegues Sumarroca Group understands it is essential that this message is transmitted clearly to the third parties it does business with, so that they formally commit to the regulations and principles set out in this Supplier Code of Ethics.

## 2. OBJECTIVE

The objective of this Code is to establish the steps that govern the ethical behaviour of all Suppliers of Bodegues Sumarroca Group in their commercial and/or business relationships with the Group companies, setting out the principles and values that define the minimum non-negotiable standards required of Suppliers.

## 3. SCOPE

The Supplier Code of Ethics is applicable to Suppliers contracted by the Group companies, which will be subject to it through their express acceptance, and it is an essential condition for initiating any commercial relationship. This Code will be accepted by the Supplier by completing the form in the section related to Suppliers in the Space

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<sup>1</sup>To this effect, Bodegues Sumarroca Group comprises the companies "Barsedana Inversions, S.L.", "Bodegues Sumarroca, S.L.", "Selfoods, S.A.", "Molí la Boella, S.L.", "Gestió Tecnoagrària, S.L." and "Morana Participacions, S.L."

for Ethics, Compliance and CSR on the Group websites ([www.sumarroca.es](http://www.sumarroca.es), [www.selfoods.com](http://www.selfoods.com), and [www.molicoloma.com](http://www.molicoloma.com)) and sending it to the email address of Bodegues Sumarroca Group indicated for this purpose.

The Supplier Code of Ethics is applicable to all Suppliers, Providers and Temporary Work Agencies (whether physical or legal people regardless of their nationality) that are or aim to be contracted by a company of Bodegues Sumarroca Group anywhere in the world.

Similarly, the Supplier Code of Ethics is applicable to companies and/or professionals that are, in turn, contracted by a Supplier to provide services or supplies to Bodegues Sumarroca Group (Subcontractors).

All the subjects obliged by our Supplier Code of Ethics shall be referred to, indiscriminately, "Supplier" or "Suppliers".

#### **4. Governing principles of the Bodegues Sumarroca Group**

The governing principles that define the ethical behaviour of Bodegues Sumarroca Group are the following:

- All their activity will be conducted in an ethical and responsible manner.
- Anyone who directly or indirectly maintains a working, economic, social or industrial relationship with the Group will be treated fairly and respectfully.
- All their activity will be conducted in a manner that is respectful of the environment.

#### **5. PRINCIPLES OF ACTION FOR SUPPLIERS**

##### *5.1 Respect for the law, human rights and ethical values*

The Supplier assumes the commitment to act in accordance with the law, with the globally accepted ethical practices, in accordance with human rights and freedoms and, in particular, with this Code of Ethics at all times.

### *5.2 Exemplary compliance with the law*

The Suppliers of Bodegues Sumarroca Group must be exemplary in their compliance with the legal stipulations applicable to them, with special respect for criminal and administrative law.

Bodegues Sumarroca Group will not contract Suppliers that have been definitively convicted of any criminal acts. This ban affects Suppliers who are legal people who have been declared criminally responsible for a crime and those whose administrators or legal representatives are in this situation, while their position or representation is valid, until their termination.

Bodegues Sumarroca Group will not contract Suppliers that are not up to date with their tax and social security obligations.

### *5.3 Business ethics and transparent management*

The Suppliers of Bodegues Sumarroca Group will conduct their commercial relationships applying principles of business ethics and transparent management.

#### a) Corruption

The relationship of the Group with its Supplier is based on the law, efficiency and transparency.

The Supplier will not tolerate, allow or be involved in any type of corruption, extortion, blackmail, misappropriation of public funds, undue appropriation and unfair administration of external patrimony, when conducting their business activity, in the public or private sector.

The Supplier will not offer, promise or concede to civil servants, other companies or private individuals or any employee of Bodegues Sumarroca Group in the context of the business activity conducted for or on behalf thereof, directly or indirectly, gifts, presents or other unjustified advantages, whether in monetary form or as other services, with the objective gaining preferential treatment in the concession or maintenance of contracts or personal benefits either for the Supplier or for Bodegues Sumarroca Group.

The Supplier must comply with the strictest standards of ethical and moral conduct, ensuring that appropriate procedures to this effect are established in their organisations.

b) Conflicts of interest

The relationships between Bodegues Sumarroca Group and its Suppliers will be governed by objective criteria. Under no circumstances may personal relationships or the interests of the Supplier's employees influence the adjudication or contracting of an order.

The Supplier must maintain mechanisms that, in the event of a potential conflict of interest of any of its employees, guarantee the independence of their actions, and full compliance with current legislation.

c) Information

The information of Bodegues Sumarroca Group entrusted to the Supplier will, in general, be considered private and confidential information. It is the Supplier's responsibility to adopt sufficient safety measures to protect this information.

Similarly, the information provided by Supplier to its contacts at Bodegues Sumarroca Group must be true and not provided with the intention to deceive.

d) Fair competition

The Supplier will have to respect fair competition, and all applicable regulations on the subject of compliance, conducting their activity ethically in their relationship with their competitors.

*5.4 Good working practices*

The Supplier, in conducting their working practices, will respect the protection of basic labour and human rights. Specifically:

a) Prohibition of discrimination and forced labour

The Supplier will reject any physical, psychological or moral harassment or abuse of power, and any other conduct that could create an intimidating environment or contravene the rights of the people.

It will not apply any type of discriminatory practices in the contracting, remuneration, access to training, promotion, contract termination or retirement, based on race, cast, creed, nationality, religion, age, physical or mental disability, gender, marital status, sexual orientation and/or political or trade union affiliation.

The Supplier will adopt the necessary measures in their organisation to eliminate all forms or types of forced or compulsory labour.

b) Health and safety at work

The Supplier will promote the adoption of policies of health and safety at work and will adopt the preventive measures established in the current legislation, complying with the standards on this matter at all times.

In this regard, the Supplier will ensure that employees are informed and protected from overexposure to chemical, biological and physical hazards and tasks that require excessive physical effort in the workplace. Similarly, the Supplier will identify and assess the potential emergency situations in the workplace and minimise their possible impact through the implementation of emergency plans and procedures to respond to emergencies.

c) Compliance with labour regulations

The Supplier will have to guarantee that the working conditions that apply to their employees comply with the Workers' Statute and the applicable Collective Agreement.

### *5.5 Environment*

The Supplier will maintain a constant commitment to environmental protection and will comply with the standards and demands established in the applicable local and international legislation, minimising the impact of its business through the efficient use of natural resources, preference for renewable energy, correct waste disposal and the reduction of greenhouse gasses.

The Suppliers of Bodegues Sumarroca Group are obliged to strictly comply with the applicable environmental regulations and commit to maintaining a preventive focus on this matter, and develop socially responsible business practices that favour the preservation of the environment and minimise the negative impact that their activity may

have on it. Bodegues Sumarroca Group will favour Suppliers that use products and raw materials obtained or manufactured by methods that are respectful of the environment.

The Suppliers of Bodegues Sumarroca Group will commit to complying with the environmental and sustainability standards established by the Group. In this regard, the Suppliers of Bodegues Sumarroca Group will always be rigorous, transparent and truthful in questionnaires, certifications, evaluations and examinations on matters on the environment, sustainability and corporate social responsibility to which they are subjected by Bodegues Sumarroca Group.

#### *5.6 Quality and safety of the product and food safety*

The Suppliers guarantee at all times that the goods, raw materials and products that they offer or supply to Bodegues Sumarroca Group comply with the food safety and quality standards required by the applicable laws, the standards they have assumed voluntarily, and the technical, quality and food safety specifications set out by Bodegues Sumarroca Group. In this regard, the Suppliers of Bodegues Sumarroca Group will always be rigorous, transparent and truthful in questionnaires, certifications, evaluations and examinations on matters of quality, product approval, composition and other food safety specifications to which they are subjected by Bodegues Sumarroca Group.

The Supplier will guarantee and accept responsibility for any harm related to food safety and quality that the goods, raw materials and products that they offer or supply to Bodegues Sumarroca Group may cause to them or to others.

#### *5.7 Fairness in the management of food crises*

The Suppliers of Bodegues Sumarroca Group that may be affected by food crisis situations will behave in accordance with the principles of cooperation and coordinated action, adaptation and proportionality of the resources throughout the food chain and good and fair communication and will not make malicious or unfair use of these situations.



#### *5.8 Prevention of food fraud*

Food fraud is understood to be any malicious act of substitution, addition, manipulation or deceptive presentation of food ingredients or packaging or the foods themselves, or false or deceptive statements made about a product or raw material.

The Suppliers of Bodegues Sumarroca Group have and will implement the necessary measures of prevention, risk assessment and analytical control to minimise or eliminate any form of food fraud, especially regarding the authenticity of species and origins, ingredients and allergens, weights, etc.

#### *5.9 Intellectual and industrial property*

The Supplier will respect the ownership of intellectual and industrial property rights of Bodegues Sumarroca Group and others. The transfer of technology and knowledge will be made in such a way that the intellectual and industrial property rights are protected.

#### *5.10 Subcontracting*

The Supplier is responsible for subjecting their own Suppliers and subcontractors to equivalent codes of practice to this Supplier Code of Ethics.

### **6. SPECIFIC MEASURES**

For the provision of services, supplies or execution of contracts, the Suppliers must adopt the following measures in their organisation:

- Promote good practices for support of and respect for human rights.
- Comply with the applicable regulations, in particular in matters of the environment, labour, money laundering prevention, anti-corruption, and personal data protection.
- Avoid entering into current, potential, and/or apparent conflicts of interest, for the fulfilment of the contractual relationship.
- Inform Bodegues Sumarroca Group of any situation in which failure to comply with the contract or the principles established in this Code or the

Code of Ethics of Bodegues Sumarroca Group is verified, as well as any complaint from third parties, or any conflict of interest.

- Maintain all licences and authorisations required up to date.
- Keep the documentation provided to Bodegues Sumarroca Group up to date and verify that it is complete and truthful.
- Eliminate all practices of discrimination, forced labour and respect trade unions and collective negotiation.

## **7. FAILURE TO COMPLY**

Should the Supplier fail to comply with the Supplier Code of Ethics of Bodegues Sumarroca Group, depending on the severity of the infraction and other concurrent circumstances, their contractual relationship with Bodegues Sumarroca Group may be immediately terminated, without prejudice to any other measures that could correspond to Bodegues Sumarroca Group to defend its legitimate interests.

## **8. ETHICS CHANNEL**

All staff that have knowledge of the failure to comply with any stipulation in this Supplier Code of Ethics must process the corresponding report/communication through the Ethics Channel (an email inbox with guaranteed confidentiality) available on the following websites of Bodegues Sumarroca Group:

- [www.sumarroca.es](http://www.sumarroca.es)
- [www.selfoods.com](http://www.selfoods.com)
- [www.molicoloma.com](http://www.molicoloma.com)

## **9. TRAINING AND COMMUNICATION**

The Suppliers are obliged to inform their employees and their subcontractors of the content of this Code, and the requirement to use the Ethics Channel to inform Bodegues

Sumarroca Group of any failure to comply, and oblige their subcontractors to inform their employees also.

## **10. COMPLIANCE SYSTEM**

The Supplier expressly commits to comply with the current legislation, the Code of Ethics of Bodegues Sumarroca Group and the stipulations of this Supplier Code of Ethics.

In addition, Bodegues Sumarroca Group encourages its Suppliers to implement their own Code of Ethics and Crime Prevention Model (*Penal System Compliance*), under the provisions of the Law.